



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

JN/DKK
F. #2017R05903

*271 Cadman Plaza East
Brooklyn, New York 11201*

February 28, 2020

By Email and ECF

Michael Levy
Joan M. Loughnane
Sidley Austin LLP

David Bitkower
Matthew S. Hellman
Jenner & Block LLP

Re: United States v. Huawei Technologies Co., Ltd., et al.
Criminal Docket No. 18-457 (S-3) (AMD)

Dear Counsel:

Enclosed please find the government's production of discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. This discovery supplements the government's previous productions. The discovery is being produced pursuant to the Protective Order entered by the Court on June 10, 2019. See ECF Docket Entry No. 57. The government also requests reciprocal discovery from the defendant.

This discovery is only being provided to Huawei Technologies Co., Ltd. and Huawei Device USA Inc. While Huawei Device Co. Ltd. and Futurewei Technologies, Inc. are newly indicted defendants in this case, neither is entitled to this discovery both because they have not yet appeared in the case and because they are not a party to the protective order.

I. The Government's Discovery

Document Description	Category of Discovery Pursuant to Protective Order	Bates Range
Financial Institution Documents, Including Customer Account Information, and Written Correspondence	Sensitive Discovery Material	DOJ_HUAWEI_A_0001520296 - DOJ_HUAWEI_A_0001556294 DOJ_HUAWEI_A_0003322183 - DOJ_HUAWEI_A_0003347133
Financial Institution Documents, Including Customer Account Information, and Written Correspondence	Discovery Material	DOJ_HUAWEI_A_0001556295 - DOJ_HUAWEI_A_0003322182 DOJ_HUAWEI_A_0003347134 - DOJ_HUAWEI_A_0004428236

Very truly yours,

RICHARD P. DONOGHUE
United States Attorney

By: /s/ Julia Nestor
Alexander A. Solomon
Julia Nestor
David K. Kessler
Sarah Evans
Assistant United States Attorneys
(718) 254-7000

DEBORAH L. CONNOR
Chief, Money Laundering and Asset
Recovery Section, Criminal Division
U.S. Department of Justice

By: /s/ Laura Billings
Laura Billings
Christian J. Nauvel
Trial Attorneys

JAY I. BRATT
Chief, Counterintelligence and Export
Control Section
National Security Division, U.S. Department
of Justice

By: /s/ Thea D. R. Kendler
Thea D. R. Kendler
David Lim
Trial Attorneys

cc: Clerk of the Court (AMD) (by ECF) (without Enclosures)